

[Submitting counsel below]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION**

No. 3:23-md-03084-CRB

**DECLARATION OF ROOPAL P. LUHANA  
IN SUPPORT OF PLAINTIFFS' MOTION  
TO ENFORCE PTO NO. 2 AND TO  
COMPEL DEFENDANTS TO PRODUCE  
LITIGATION HOLD AND  
PRESERVATION INFORMATION**

This Document Relates to:  
  
All Cases

Judge: Honorable Charles R. Breyer  
Date: January 19, 2024  
Time: 10:00 AM  
Courtroom: 6 – 17th Floor (by Zoom)

I, Roopal P. Luhana, declare and state as follows:

1. I am an attorney and partner at Chaffin Luhana LLP, counsel for Plaintiffs and Court-appointed Co-Lead Counsel in this action. I am a member in good standing of the State Bars of New York, New Jersey, and Pennsylvania, and am admitted *pro hac vice* in this coordinated action. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. I submit this Declaration in support of Plaintiffs' motion to enforce PTO No. 2 and to compel Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively "Uber") to produce litigation hold and preservation information.

3. On November 17, 2023, Plaintiffs' Counsel met and conferred with Defendants' counsel regarding concerning the steps Uber has taken to preserve potentially relevant ESI, and the discovery of such, per the Court's November 3, 2023 Order (PTO No. 2) (ECF No. 65).

DECL. OF R. LUHANA  
ISO MOTION TO ENFORCE PTO 2  
CASE NO. 3:MD-03084-CRB